

# Sage Legal LLC

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February 4, 2026

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Vera M. Scanlon, Chief U.S.M.J.  
225 Cadman Plaza East  
Courtroom 13A South  
Brooklyn, NY 11201-1804

**Re: Singh v. Topline NYC Contracting Inc., et al.**  
**Case No.: 1:25-cv-776 (NCM) (VMS)**

Dear Chief Judge Scanlon:

This firm represents Plaintiff Joginder Singh (hereinafter the “Plaintiff”) in the above-referenced case. Plaintiff writes, pursuant to the Court’s Order dated January 15, 2026, to inform the court that Plaintiff has not received discovery responses from Defendants.

Jarringly, however, on January 28, 2026, Defendants did file a motion to vacate this Court’s January 1, 2026 Order granting an extension of time to Plaintiff as well as a motion for extension of time to complete discovery. See ECF Docket Entries [47](#) and [48](#). Additionally, on January 30, 2026, Defendants filed a reply in opposition to Plaintiff’s letter motion to dismiss Defendants’ counterclaims. See ECF Docket Entry [49](#).

Accordingly, Plaintiff respectfully submits that he intends to move this Court on March 31, 2026, or as soon thereafter as counsel may be heard, for an Order, pursuant to Rule 37 of the Federal Rules of Civil Procedure (hereinafter referred to as “Rules” or “Rule”), imposing sanctions against Defendants for their failure to timely serve discovery responses as ordered by this Court on January 15, 2026 as well as for their failure to appear for the status conference on January 15, 2026.

In advance of that motion, Plaintiff respectfully proposes the following briefing schedule: Plaintiff shall file its motion by March 10, 2026; Defendants shall file any opposition by March 24, 2026; and Plaintiff shall file any reply by March 31, 2026, at which time the motion shall be deemed fully submitted.

Plaintiff thanks this Court for its time, attention, and anticipated courtesies in this case. Plaintiff also apologizes for not submitting this letter yesterday as required by this Court’s January 15, 2026 Order. The reason for the failure to do so is because your undersigned has been preparing opposition to a motion to certify a class action and a collective action in the matter of Fernandez, et al. v. Bulldozer Hospitality Group, Inc., et al.; Case No.: 1:25-cv-4490 (AS) (GS). Plaintiff respectfully submits that there is therefore good cause and excusable neglect warranting an extension of time to comply with the January 15, 2026 Order *nunc pro tunc*.

Dated: Jamaica, New York  
February 4, 2026

Respectfully submitted,

**SAGE LEGAL LLC**

By: /s/ Emanuel Kataev, Esq.  
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**VIA ECF**  
All counsel of record